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Attorneys for Defendant Gerber Products Company

[Counsel for Plaintiff and Additional Defendants Listed on Signature Page]

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

K.M., a minor child by and through his legal
guardian, ROBIN MAGLINTI,

Plaintiffs,

vs.

BEECH-NUT NUTRITION COMPANY,
INC.; GERBER PRODUCTS COMPANY;
and WALMART INC.,

Defendants.

CASE NO.: 2:23-cv-02121-CDS-MDC

**STIPULATION AND PROPOSED ORDER
TO EXTEND TIME TO RESPOND TO
COMPLAINT**

(FIRST REQUEST)

Defendants Gerber Products Company ("Gerber"), Beech-Nut Nutrition Company, Inc. ("Beech-Nut"), and Walmart Inc. ("Walmart") (collectively "Defendants"), and Plaintiff K.M., by and through his legal guardian, Robin Maglinti ("Plaintiff"), by and through their undersigned counsel of record, stipulate and agree as follows:

1. Plaintiff initiated this action by filing the Complaint on December 22, 2023. [ECF No. 1].
2. Plaintiff served Gerber on March 15, 2024, and the current deadline for Gerber to move, plead, or otherwise respond to the Complaint is April 5, 2024.
3. Plaintiff served Beech-Nut on March 13, 2024, and the current deadline for Beech-Nut to move, plead, or otherwise respond to the Complaint is April 3, 2024.
4. Plaintiff served Walmart on March 19, 2024, and the current deadline for Walmart to move, plead, or otherwise respond to the Complaint is April 9, 2024.

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5. The parties agree that the deadline for all Defendants to move, plead, or otherwise respond to the Complaint shall be extended up to and including June 4, 2024.

6. There is good cause for the requested extension and the extended time will allow Defendants to investigate the allegations in the Complaint and adequately prepare a response.

7. This is the first request for an extension, and it is made in good faith and not for purposes of delay.

Dated: April 1, 2024

Dated: April 1, 2024

PISANELLI BICE PLLC

MORRIS, SULLIVAN & LEMKUL, LLP

By: /s/ M. Magali Mercera
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By: /s/ Will Lemkul
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Attorneys for Gerber Products Company

and

Dated: April 1, 2024

Roopal Luhana (admitted *pro hac vice*)
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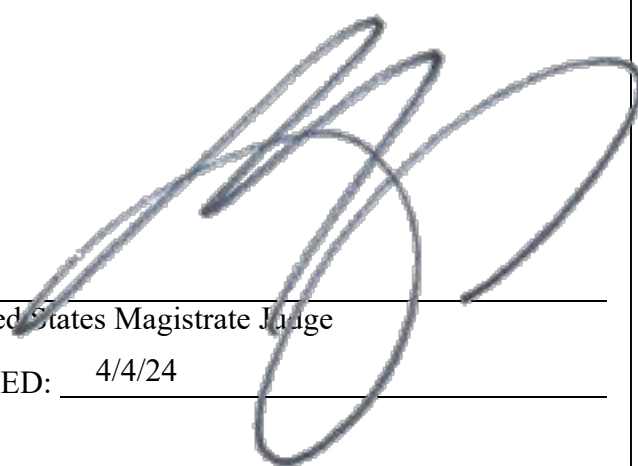
WILEY PETERSEN

Attorneys for Plaintiff

By: /s/ Jason M. Wiley
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*Attorneys for Beech-Nut Nutrition Company, Inc.
and Walmart Inc*

IT IS SO ORDERED.


United States Magistrate Judge

DATED: 4/4/24

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